

# EXHIBIT F

Lisa Laurin  
May 24, 2017

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

|                           |   |                                |
|---------------------------|---|--------------------------------|
| SHERWIN T. WRIGHT         | ) |                                |
| Plaintiff,                | ) |                                |
|                           | ) |                                |
| vs.                       | ) | Civil Action NO. 4:15-cv-02363 |
|                           | ) |                                |
| CHEVRON PHILLIPS CHEMICAL | ) |                                |
| COMPANY, LP               | ) |                                |
| Defendant                 | ) |                                |

ORAL DEPOSITION

LISA LAURIN

MAY 24, 2017

ORAL DEPOSITION OF LISA LAURIN, produced as a witness at the instance of the Plaintiff and duly sworn, was taken in the above-styled and numbered cause on the 24th day of May, 2017, from 2:20 p.m. to 4:20 p.m., before Melinda Barre, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, Harris County, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

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APPEARANCES

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## EXHIBITS

| EXHIBIT   | DESCRIPTION  | PAGE |
|-----------|--|------|
| Exhibit 1 | 10-30-14 Letter to Tyrell Wright from Andy Woods                   | 25   |
| Exhibit 2 | 10-27-14 Email from Tyrell Wright to Pete Cella                    | 44   |
| Exhibit 3 | 10-28-14 Email from Pete Cella to Tyrell Wright                    | 45   |
| Exhibit 4 | 11-18-14 Last Chance Letter Signed by Tyrell Wright and Andy Woods | 49   |
| Exhibit 5 | Working Rules & Discipline Policy                                  | 55   |
| Exhibit 6 | PowerPoint Entitled Total Absence Management                       | 61   |

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1 LISA LAURIN,  
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 QUESTIONS BY MR. ARMSTRONG:

5 Q. Good afternoon, ma'am. Can you state your name  
6 for the record, please.

7 A. Lisa Laurin, L-a-u-r-i-n.

8 Q. Okay. And, Ms. Laurin, I know that you have  
9 testified in an arbitration related to the events that  
10 we are here about today. Is that correct?

11 A. Yes.

12 Q. And you've sat in on now two depositions. So  
13 you know how it's going to go today. There's no use in  
14 reiterating deposition conduct other than to say  
15 whenever you're ready to take a break, let me know. If  
16 you don't understand a question I ask you, let me know;  
17 and I'll rephrase it for you. Okay?

18 A. Okay.

19 Q. You're currently employed at Chevron Phillips  
20 Chemical Company. Did I say that right?

21 A. Yes.

22 Q. And your title is what?

23 A. HR manager.

24 Q. You've been there for how long?

25 A. Four years.



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1 T leads, did he say that that left the piece of  
2 equipment energized?

3 A. No.

4 Q. Did y'all have any conversation about whether  
5 or not the specific failure that Mr. Wright was  
6 perceived to have made caused any actual harm to  
7 anybody?

8 A. No.

9 Q. And so is it fair to categorize it as he came  
10 and explained what was not done, but he didn't  
11 necessarily explain what the fallout or result of it not  
12 being done was?

13 A. That's fair.

14 Q. And then after that initial conversation did  
15 you conduct an investigation as to whether or not  
16 Mr. Wright actually failed to not disconnect the  
17 T leads?

18 A. No.

19 Q. You didn't do that investigation?

20 A. No, I didn't.

21 Q. Did anybody else do that investigation?

22 A. Yes.

23 Q. Who did the investigation?

24 A. Virginia Hubbard, Adam Sainato and Keith  
25 Bravenec.

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1 separate functions of investigation?

2 A. A team.

3 Q. Can you explain for us everything that they did  
4 to investigate the incident.

5 A. I don't know every single thing that they did.  
6 I know high level, that they talked to Tyrell. They  
7 talked to Billy Donnell. After that point they came  
8 back to me.

9 Q. Okay. Did they prepare any written reports to  
10 you?

11 A. Yes.

12 Q. Okay. And the contents of that written report  
13 said what based on your recollection?

14 A. That Tyrell was supposed to remove the T leads  
15 as part of this isolation, and he signed off on the  
16 paperwork that he had done the work when he had not.

17 Q. What form was that written report in? Was it  
18 an e-mail, or was it an actual formal report?

19 A. Honestly, I don't remember.

20 Q. When a written report like that is generated in  
21 these circumstances, is that something that is  
22 maintained in the employee's personnel file?

23 A. No.

24 Q. Why not?

25 A. It's a separate file.

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1 at any time after he told you about that conversation?

2 A. No.

3 Q. Other than yourself, who else did Mr. Pyner  
4 talk to after having this conversation with Mr. Cella  
5 about Mr. Wright's suspension?

6 MS. WILLIAMS: Objection, calls for  
7 speculation.

8 A. I don't know.

9 Q. (By Mr. Armstrong) Do you know or have you  
10 ever heard whether he talked with Keith Bravenec about  
11 it?

12 A. I don't know.

13 Q. Do you know whether Keith Bravenec knows about  
14 this conversation between Pete Cella and Joe Pyner?

15 A. Can you ask me the question again.

16 Q. Do you know if Mr. Bravenec even knows about  
17 this conversation that happened between Mr. Pyner and  
18 Mr. Cella?

19 A. I don't know.

20 Q. Personally did you have any feelings about  
21 Mr. Wright going all the way to the top and talking to  
22 Mr. Cella?

23 A. No.

24 Q. No feelings whatsoever about that?

25 A. No. No feelings.



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1 Q. Was that something that you thought overstepped  
2 your authority?

3 A. Not at all.

4 Q. And so is it something that occurs frequently,  
5 to have employees take their suspensions up to the CEO?

6 A. No.

7 Q. Prior to Mr. Wright doing this, had anybody  
8 else during your tenure taken a concern about an  
9 employment issue directly up to Mr. Cella?

10 A. No.

11 Q. Do you know whether anybody after Mr. Wright  
12 has taken an employment concern directly to Mr. Cella?

13 A. No, they have not.

14 Q. Let me show you what we'll mark as Exhibit 4.

15 (Exhibit 4 marked)

16 Q. (By Mr. Armstrong) Have you ever seen this  
17 letter before?

18 A. Yes.

19 Q. And this is a letter, again, from Mr. Woods,  
20 maintenance manager. And it's to Mr. Wright, and it's  
21 dated November 18, 2014. It's a last chance letter.

22 And it starts out, it says, "On  
23 October 30, 2014 you were returned to work and given a  
24 final warning after two weeks suspension for a serious  
25 safety violation."

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HOUSTON DIVISION

SHERWIN T. WRIGHT                     )  
Plaintiff,                                 )  
  )  
vs.   ) Civil Action NO. 4:15-cv-02363  
  )  
CHEVRON PHILLIPS CHEMICAL         )  
COMPANY, LP                            )  
Defendant                                )

REPORTER'S CERTIFICATE  
ORAL DEPOSITION OF LISA LAURIN  
May 24, 2017

I, Melinda Barre, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:

That the witness, LISA LAURIN, was duly sworn by the  
officer and that the transcript of the oral deposition  
is a true record of the testimony given by the witness;

That the original deposition was delivered to  
Marrick Armstrong.

That a copy of this certificate was served on all  
parties and/or the witness shown herein  
on \_\_\_\_\_.

I further certify that pursuant to FRCP Rule  
30(f)(1), that the signature of the deponent:

\_\_\_\_\_ was requested by the deponent or a party before

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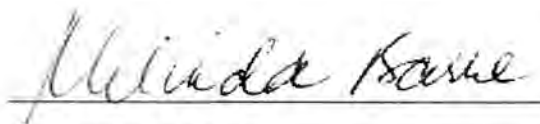
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1 the completion of the deposition and that the signature is  
2 to be before any notary public and returned within 30 days  
3 from date of receipt of the transcript. If returned,  
4 the attached Changes and Signature Page contains any  
5 changes and the reasons therefor:

6 \_\_\_\_\_ was not requested by the deponent or a  
7 party before the completion of the deposition.

8 I further certify that I am neither counsel for,  
9 related to, nor employed by any of the parties or  
10 attorneys in the action in which this proceeding was  
11 taken, and further that I am not financially or  
12 otherwise interested in the outcome of the action.

13 Certified to by me on this, the \_\_\_\_\_ day  
14 of \_\_\_\_\_, 2018.

15  
16  
17 

18 Melinda Barre  
19 Texas CSR 2192  
20 Expiration: 12/31/18  
21  
22  
23  
24  
25





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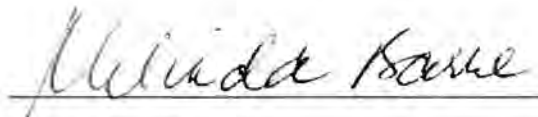
1 COUNTY OF HARRIS )

2 STATE OF TEXAS )

3 I hereby certify that the witness was notified on  
4 \_\_\_\_\_ that the witness has 30 days or (\_\_\_\_  
5 days per agreement of counsel) after being notified by  
6 the officer that the transcript is available for review  
7 by the witness and if there are changes in the form or  
8 substance to be made, then the witness shall sign a  
9 statement reciting such changes and the reasons given by  
10 the witness for making them;

11 That the witness' signature was/was not returned as  
12 of \_\_\_\_\_.

13 Subscribed and sworn to on this, the \_\_\_\_\_ day of  
14 \_\_\_\_\_, 2018.

15  
16  
17  
18 

19  
20 Melinda Barre  
21 Texas CSR 2192  
22 Expiration: 12/31/18  
23  
24  
25